

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

PATRICK PURSLEY,)	
)	
Plaintiff,)	
v.)	
)	
THE CITY OF ROCKFORD, JAMES)	
BARTON, JIM BOWMAN, HOWARD)	Case: 18 C 50040
FORRESTER, RON GALLARDO, JOHN)	
GENENS, CHARLENE GETTY, JEFF)	District Judge Philip G. Reinhard
HOUDE, SAM POBJECKY, GARY)	
REFFETT, MARK SCHMIDT, BRUCE)	Magistrate Judge Lisa A. Jensen
SCOTT, DOUG WILLIAMS,)	
UNIDENTIFIED EMPLOYEES OF THE)	
ROCKFORD POLICE DEPARTMENT,)	
DANIEL GUNNELL, PETER)	
STRIUPAITIS, JACK WELTY,)	
UNIDENTIFIED EMPLOYEES OF THE)	
ILLINOIS STATE POLICE CRIME LAB,)	
GREG HANSON, STEPHEN PIRAGES,)	
DAVID EKEDAHL, and CHRISTINE)	
BISHOP,)	
)	
Defendants.)	

Defendant Christine Bishop's Motion to Dismiss

Defendant Christine Bishop states as follows for her Motion to Dismiss:

1. Defendants' City of Rockford, James Barton, Ron Gallardo, John Genens, Charlene Getty, Jeff Houde, Sam Pobjecky, and Mark Schmidt have pending before this Court a Motion to Dismiss. (dkt # 55). Defendant Greg Hanson subsequently joined that motion. (dkt # 75, 81).
2. Defendants Bruce Scott, Doug Williams and Steve Pirages subsequently were served, and filed a similar Motion to Dismiss. (dkt # 84).

3. Due to an apparent misnomer in the proof of service intended to prove service upon defendant Christine Bishop (dkt # 48), the undersigned did not initially appear on her behalf or move for her dismissal. However, since that time, the undersigned has conferred with plaintiff's counsel and agreed to waive any defect in service and appear on behalf of Christine Bishop, f/k/a Christine McAnally.

4. Defendant Bishop should be dismissed for the same reasons articulated in the pending Motion to Dismiss, the arguments from which are adopted as if fully set forth herein. (dkt # 55).

5. The Amended Complaint (dkt # 49) states that Bishop was a Rockford police officer that participated in the murder investigation. (dkt # 49 at ¶ 10). That is the sole allegation particular to that defendant.

6. As stated in the pending motion to dismiss (dkt # 55), those kinds of paltry allegations fail to meet the applicable pleading standard. To the extent plaintiff's Amended Complaint makes conclusory allegations against "Defendant Officers" or "Defendants," without distinction or differentiation, the claims against Christine Bishop are not pled with enough factual particularity to make those claims plausible.

WHEREFORE, Defendant Christine Bishop respectfully requests an order dismissing her from the suit pursuant to Rule 12(b)(6).

Defendant Christine Bishop,
By: WilliamsMcCarthy LLP

BY: /s/ Joel M. Huotari
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CERTIFICATE OF SERVICE

I, Joel M. Huotari, an attorney, certify that on June 5, 2019, I caused the foregoing document to be filed via the Court's CM/ECF system, which effected service on all counsel of record.

BY: /s/ Joel M. Huotari
Joel M. Huotari